

EXHIBIT 1 TO ORDER

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

BAYOU STEEL BD HOLDINGS, LLC, *et al.*,¹

Debtors.

GEORGE L. MILLER, in his capacity as Chapter 7
Trustee of BAYOU STEEL BD HOLDINGS, L.L.C.,
et al.,

Plaintiff,

vs.

SUNFLOWER CONSTRUCTION,

Defendant.

Chapter 7

Case No. 19-12153 (KBO)

(Jointly Administered)

Adv. Proc. No. 21-50231 (KBO)

**STIPULATION FOR EXTENSION OF TIME FOR DEFENDANT TO
ANSWER, MOVE OR OTHERWISE RESPOND TO THE COMPLAINT**

Plaintiff, George L. Miller in his capacity as chapter 7 trustee of Bayou Steel BD Holdings, L.L.C., *et al.*, (the “**Plaintiff**”), for the estates of the above-captioned debtors (the “**Debtors**”) in the above-captioned cases pending under chapter 7 of title 11 of the United States Code (the “**Bankruptcy Code**”), by and through his undersigned counsel and defendant Sunflower Construction (the “**Defendant**,” and together with Plaintiff, the “**Parties**”), enter into this *Stipulation for Extension of Time for Defendant to Answer, Move or Otherwise Respond to the Complaint* (the “**Stipulation**”) and hereby stipulate and agree as follows:

1. The Parties agree and stipulate that the time within which the Defendant may answer, move, or otherwise plead in response to the *Complaint* [D.I. 1] in the above-captioned

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are Bayou Steel BD Holdings, L.L.C., a Delaware limited liability company (1984), BD Bayou Steel Investment, LLC, a Delaware limited liability company (1222), and BD LaPlace, LLC, a Delaware limited liability company (5783).

adversary proceeding is hereby extended to and including May 15, 2021.

2. Except as specifically set forth herein, all rights, claims and defenses of the Parties are fully preserved.

Dated: April 20, 2021

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Peter J. Keane

Bradford J. Sandler (DE Bar No. 4142)
Andrew W. Caine (CA Bar No. 110345)
Peter J. Keane (DE Bar No. 5503)
919 North Market Street, 17th Floor
P.O. Box 8705
Wilmington, Delaware 19899-8705 (Courier 19801)
Telephone: (302) 652-4100
Facsimile: (302) 652-4400
Email: bsandler@pszjlaw.com
acaine@pszjlaw.com
pkeane@pszjlaw.com

Counsel to Plaintiff

and

WEYCER, KAPLAN, PULASKI & ZUBER, P.C.

/s/ Jeff Carruth

Jeff Carruth, Esq.
24 Greenway Plaza, Suite 2050
Houston, Texas 77046
Tel: (214) 552-7242
Fax: (866) 666-5322
Email: jcarruth@wkpz.com

Counsel to Defendant